

EXHIBIT 2

Notice of Removal (State Court) (without exhibits)

EXHIBIT 2

Notice of Removal (State Court) (without exhibits)

2580

1 ROBERT A. DOTSON
2 Nevada State Bar No. 5285
3 JUSTIN C. VANCE
4 Nevada State Bar No. 11306
5 DOTSON LAW
6 5355 Reno Corporate Dr., Ste 100
7 Reno, Nevada 89511
8 Tel: (775) 501-9400
9 Email: rdotson@dotsonlaw.legal
10 jvance@dotsonlaw.legal
11 Attorneys for Defendant,
12 Washoe County School District

13 **IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
14 **IN AND FOR THE COUNTY OF WASHOE**

15 TRINA OLSEN,

16 Plaintiff,

17 vs.

18 WASHOE COUNTY SCHOOL
19 DISTRICT, a political subdivision of the
20 State of Nevada; Washoe County School
21 District Superintendent TRACI DAVIS;
22 and DOES 1 through 10, inclusive,

23 Defendants.

Case No.: CV19-01900

Dept. No.: 1

24 **NOTICE OF REMOVAL**

25 TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR
26 ATTORNEYS OF RECORD:

27 PLEASE TAKE NOTICE that Defendant WASHOE COUNTY SCHOOL
28 DISTRICT ("Defendant" and/or "WCSD") has filed a Notice of Removal of Complaint
29 under 28 U.S.C. § 1441 (Federal Question Jurisdiction) to the United States District Court
30 for the District of Nevada. Attached hereto as **Exhibit 1** is a true and correct copy of the
31 said Notice of Removal of Complaint to United States District Court (without exhibits).

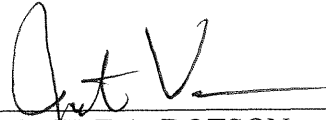
32 The Second Judicial District Court of the State of Nevada in and for the County of
33 Washoe is hereby requested to proceed no further with this matter unless the case is
34 remanded.

Affirmation Pursuant to NRS 239B.030

The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

DATED this 1st day of November, 2019.

DOTSON LAW



ROBERT A. DOTSON
Nevada State Bar No. 5285
JUSTIN C. VANCE
Nevada State Bar No. 11306
5355 Reno Corporate Dr., Ste 100
Reno, Nevada 89511
(775) 501-9400
Attorneys for Defendant,
Washoe County School District

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of DOTSON LAW
and that on this date I caused to be served a true and correct copy of the foregoing by:

- ☐ (BY MAIL) on all parties in said action, by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth below. At Dotson Law, mail placed in that designated area is given the correct amount of postage and is deposited that same date in the ordinary course of business, in a United States mailbox in the City of Reno, County of Washoe, Nevada.
- ☒ By electronic service by filing the foregoing with the Clerk of Court using the E-Flex system, which will electronically mail the filing to the following individuals.
- ☐ (BY PERSONAL DELIVERY) by causing a true copy thereof to be hand delivered this date to the address(es) at the address(es) set forth below.
- ☐ (BY FACSIMILE) on the parties in said action by causing a true copy thereof to be telecopied to the number indicated after the address(es) noted below.
- ☒ Email.

addressed as follows:

Luke A. Busby
Luke Andrew Busby, Ltd.
316 California Ave., # 82
Reno, NV 89509
luke@lukeandrewbusbyltd.com

DATED this 1 day of November, 2019.


L. MORGAN BOGUMIL

INDEX OF EXHIBITS

EXHIBIT	DESCRIPTION	PAGES
1	Notice of Removal of Complaint to United States District Court	7

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28